

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Perdue, George Ervin

Secretary, Department of Agriculture

Other Federal Government Positions Held During the Preceding 12 Months:

None

Names of Congressional Committees Considering Nomination:

- **Committee on Agriculture, Nutrition, and Forestry**
-

Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ **Perdue, George Ervin** [electronically signed on 02/01/2017 by **Perdue, George Ervin** in [Integrity.gov](#)]

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ **Bender, Stuart, Certifying Official** [electronically signed on 03/10/2017 by **Bender, Stuart** in [Integrity.gov](#)]

Other review conducted by

U.S. Office of Government Ethics Certification

/s/ **Shaub, Walter M, Certifying Official** [electronically signed on 03/10/2017 by **Shaub, Walter M** in [Integrity.gov](#)]

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Perdue Management Holdings LLC	Bonaire, Georgia	Limited Liability Company	Manager	10/2010	Present
2	Perdue Family Revocable Management Trust	Bonaire, Georgia	Trust	Trustee	12/2010	Present
3	Bipartisan Policy Center Governor's Council	Washington, District of Columbia	Non-Profit	Council Member	8/2012	Present
4	Georgia Agribusiness Council	Commerce, Georgia	State Agriculture Industry Organization	Secretary	1/2015	Present
5	National Grain and Feed Association	Arlington, Virginia	Industry Association	Member, Board of Directors	1/2015	Present
6	Perdue Business Holdings, Inc.	Bonaire, Georgia	Corporation	Member, Board of Directors	12/2010	Present
7	Perdue Properties LLC	See Endnote	Limited Liability Company	Sole Owner	11/2010	Present
8	Perdue Real Estate Holdings LLLP	See Endnote	Limited Liability Limited Partnership	Sole Owner	11/2010	Present

2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Roth IRA	No			
1.1	Fidelity Government Cash Reserves (FDRXX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.2	Fidelity 500 Index Premium Class (FUSVX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.3	Baron Emerging Markets Fund Retail (BEXFX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.4	Columbia Dividend Opportunity CL A (INUTX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.5	Columbia Select Lrg Cap Growth CL A (ELGAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.6	Delaware Value Fund CL A (DDVAX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
1.7	Driehaus Micro Cap Growth Fund (DMCRX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.8	MFS International Value Fund CL A (MGIAX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
1.9	T Rowe Price Growth Stock Advisor CL (TRSAX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.10	Ridgeworth Ceredex Mid Cap Value EQ I (SMTTX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
1.11	T Rowe Price Intl Stock Advisor CL (PAITX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.12	TCW Relative Value Dividend Apprec CL N (TGIGX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
1.13	Touchstone Focused CL A (TFOAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.14	Touchstone Small Cap Value CL A (TVOAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.15	Victory Global Natural Resources A (RSNRX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.16	Wasatch International Opportunities Fund (WAIOX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.17	Wasatch Frontier Emerging Small CO's (WAFMX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.18	Avenue Credit Strategies Investor (ACCSAX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.19	Doubleline Total RT Bond FD CL N (DLTNX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1.20	Doubleline Low Durtn Emerg Mkts FX Inc N (DELNX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.21	Dreyfus Bond Market Index Invs (DBMIK)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.22	Driehaus Event Driven Fund (DEVDX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.23	Driehaus Active Income Fund (LCMAX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
1.24	JP Morgan Strategic Income Opport A (ISOAX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.25	Riverpark Strategic Income Fund Retail (RSIVX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.26	Riverpark Short Term High Yield Retail (RPHYX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.27	Rivernorth Core Opportunity FD L R (RNCOX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
2	Georgia Legislative Retirement System (Defined Benefit Pension - Value not Readily Ascertainable)	N/A		State retirement payments. Filer receives \$326.71 per month.	
3	Bipartisan Policy Center, Inc.	N/A		Compensation for service as a Member of the Governor's Council.	\$30,000
4	Bipartisan Policy Center, Inc. - 7/26/16	N/A		Honorarium	\$10,000
5	Poplar Springs North Baptist Church - 2/17/16	N/A		Honorarium	\$300

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Georgia Legislative Retirement System	Atlanta, Georgia	I have a defined benefit pension from the State of Georgia. I receive \$326.71 per month. I will continue to participate in this plan.	1/1992

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Bipartisan Policy Center, Inc.	Washington, District of Columbia	Service as member of the Governor's Council to help formulate bipartisan policy as well as honorarium.

5. Spouse's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Roth IRA	No			
1.1	JP Morgan Income Builder Fund CI C (JNBGX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S.bank account #1 (cash)	N/A	\$50,001 - \$100,000	Interest	\$201 - \$1,000
2	Residential real estate, Butts County, Georgia	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
3	Undeveloped land, Osceola County, Florida	N/A	\$250,001 - \$500,000		None (or less than \$201)
4	Undeveloped land, Houston County, Georgia	N/A	\$250,001 - \$500,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
5	Undeveloped land, Houston County, Georgia	N/A	\$100,001 - \$250,000		None (or less than \$201)
6	TIAA Path2College 529 Plan	See Endnote	Yes	\$50,001 - \$100,000	None (or less than \$201)
7	Note Receivable from AGrowStar, LLC	N/A	\$500,001 - \$1,000,000	Interest	\$50,001 - \$100,000
8	Perdue Family Wealth Preservation Trust	See Endnote	No		
8.1	FALF LLC	See Endnote	No		
8.1.1	Soque River Conservation LLC	See Endnote	N/A	\$500,001 - \$1,000,000	Land rent and sale of conservation mitigation bank credits.
8.2	Perdue Business Holdings Inc.	See Endnote	No		
8.2.1	Legacy 13:22 LLC	See Endnote	N/A		
8.2.1.1	TW Rocky Mount Real Estate LLC	See Endnote	N/A	\$500,001 - \$1,000,000	None (or less than \$201)
8.2.1.2	TWAS Rocky Mount LLC	See Endnote	N/A	None (or less than \$1,001)	None (or less than \$201)
8.2.1.3	U.S. bank account #3	N/A	\$15,001 - \$50,000	Interest	None (or less than \$201)
8.2.2	Perdue Partners LLC	See Endnote	No	None (or less than \$1,001)	None (or less than \$201)
8.2.2.1	Perdue Consulting Group LLC	See Endnote	N/A	None (or less than \$1,001)	None (or less than \$201)
8.2.2.2	Benton Global LLC	See Endnote	N/A	None (or less than \$1,001)	None (or less than \$201)
8.2.2.3	Benton Logistics LLC	See Endnote	N/A	None (or less than \$1,001)	None (or less than \$201)
8.2.3	U.S. bank account #2 (cash)	N/A	\$250,001 - \$500,000	Interest	\$2,501 - \$5,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT	
8.2.4	AGrowStar LLC	See Endnote	N/A	\$5,000,001 - \$25,000,000	Passive business ownership income.	\$15,326
8.2.5	Perdue, Inc.	See Endnote	N/A	\$1,000,001 - \$5,000,000	Passive business ownership income.	\$598,591
8.2.6	Houston Fertilizer and Grain Co., Inc.	See Endnote	N/A	\$1,000,001 - \$5,000,000	Passive business ownership income.	\$28,305
8.2.7	ProAg Products LLC	See Endnote	N/A	\$50,001 - \$100,000	Passive business ownership income.	\$50,307
8.2.8	StarPort Logistics LLC	See Endnote	N/A	\$100,001 - \$250,000	Passive business ownership income.	\$99,587
9	Perdue Family Revocable Management Trust	See Endnote	No			
9.1	Perdue Management Holdings LLC	See Endnote	N/A	None (or less than \$1,001)		None (or less than \$201)
9.2	Perdue Business Holdings, Inc.	See Endnote	No			None (or less than \$201)
10	Note receivable from the Perdue Family Wealth Preservation Trust	N/A	\$1,000,001 - \$5,000,000	Interest	\$15,001 - \$50,000	

7. Transactions

(N/A) - Not required for this type of report

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Citizens Bank of the South	Personal Loan	\$15,001 - \$50,000	2016	2.250%	12/2017
2	CB&T	Loan Guarantor 50%	\$500,001 - \$1,000,000	2013	3.25%	12/2021
3	CB&T	Loan Guarantor 50%	\$500,001 - \$1,000,000	2013	3.25%	12/2021
4	Morris Bank	Loan Guarantor	\$250,001 - \$500,000	2016	4.45%	192 Months

9. Gifts and Travel Reimbursements

(N/A) - Not required for this type of report

Endnotes

PART	#	ENDNOTE
1.	7	Perdue Properties LLC is an empty company which has never held any assets nor engaged in any business.
1.	8	Perdue Real Estate Holdings LLLP is an empty company which has never held assets nor engaged in any business.
6.	6	This investment, the 100% EQUITY option, tracks the TIAA-CREF Equity Index Fund Institutional Class (TIEIX)
6.	8	Perdue Family Wealth Preservation Trust owns FALF and 100% of the non-voting stock in Perdue Business Holdings Inc.
6.	8.1	FALF LLC is a single member Limited Liability Company owned by Perdue Family Wealth Preservation Trust. FALF LLC is a holding company for Soque River Conservation LLC.

PART	#	ENDNOTE
6.	8.1.1	Soque River Conservation LLC is owned by FALF LLC. Soque River Conservation LLC is a passive landholding partnership on the Soque River in Georgia.
6.	8.2	Perdue Business Holdings Inc. is owned by the Perdue Family Wealth Preservation Trust and the Perdue Family Revocable Trust. Underlying assets of Perdue Business Holdings are shown in Lines 8.2 through 8.2.8, and the value shown for the underlying assets is the full value for each holding.
6.	8.2.1	Legacy 13:22 LLC is a single member LLC owned by Perdue Business Holdings Inc. Legacy 13:22 is a holding company for TW Rocky Mount Real Estate LLC and TWAS Rocky Mount LLC.
6.	8.2.1.1	TW Rocky Mount Real Estate LLC is majority owned by Legacy 13:22 LLC. TW Rocky Mount Real Estate LLC owns the real estate in Rocky Mount, North Carolina, upon which the car wash owned by TWAS Rocky Mount LLC is being constructed.
6.	8.2.1.2	TWAS Rocky Mount LLC is majority owned by Legacy 13:22 LLC. TWAS Rocky Mount LLC is an operating business that owns a car wash that is currently under construction.
6.	8.2.2	Perdue Partners LLC is 25% owned by Perdue Business Holdings Inc. This consulting company is dormant.
6.	8.2.2.1	Perdue Consulting Group LLC is owned by Perdue Partners LLC. This business consulting company is not currently operating and has no current clients.
6.	8.2.2.2	Benton Global LLC is owned by Perdue Partners LLC. This is a trucking company that is not currently operating.
6.	8.2.2.3	Benton Logistics LLC is owned by Perdue Partners LLC. This is a logistics company that is not currently operating.
6.	8.2.4	AGrowStar LLC is a Qualified Subchapter S Subsidiary owned by Perdue Business Holdings Inc. AGrowStar LLC is a grain merchandising company.
6.	8.2.5	Perdue Inc. is a Qualified Subchapter S Subsidiary owned by Perdue Business Holdings Inc. Perdue Inc is a trucking company.
6.	8.2.6	Houston Fertilizer and Grain Co., Inc. is a Qualified Subchapter S Subsidiary owned by Perdue Business Holdings Inc. Houston Fertilizer and Grain Co, Inc. does not engage in agribusiness, it simply holds, manages and rents commercial real estate in Bonaire, Fort Valley, and Calhoun, Georgia.
6.	8.2.7	ProAg Products LLC is a single member Limited Liability Company owned by Perdue Business Holdings Inc. ProAg Products is a grain market trading business.
6.	8.2.8	StarPort Logistics LLC is a single member Limited Liability Company owned by Perdue Business Holdings Inc. StarPort Logistics LLC is an operating logistics company.
6.	9	Perdue Family Revocable Management Trust owns Perdue Management Holding LLC and 100% of voting stock of Perdue Business Holdings Inc.

PART	#	ENDNOTE
6.	9.1	Perdue Management Holdings LLC is 100% owned by the Perdue Family Revocable Management Trust. Perdue Management Holdings LLC is a holding company that is dormant and has no assets or holdings.
6.	9.2	Underlying assets of Perdue Business Holdings is shown in Lines 8.2 through 8.2.8.

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

5. Spouse's Employment Assets & Income and Retirement Accounts

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$150 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

Public Burden Information

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

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